

201-15253

Anh Nguyen

05/10/2004 08:05 AM

To: NCIC HPV@EPA

CC:

Subject: Fw: API HPV consortium

- response to EPA letter dated 4/12/04

----- Forwarded by Anh Nguyen/DC/USEPA/US on 05/10/2004 08:04 AM -----



Lorraine Twerdok
<Twerdokl@api.org>

05/07/2004 04:58 PM

To: NCIC OPPT@EPA, Rtk Chem@EPA

cc: Charles Auer/DC/USEPA/US@EPA, Richard Hefter/DC/USEPA/US@EPA, "HPV OC
listserve (E-mail)" <HPV-OC@listserve.api.org>, "HPV Tech listserve (E-mail)"
<hvp-techwg@listserve.api.org>

Subject: API HPV consortium

- response to EPA letter dated 4/12/04

On behalf of member companies of the American Petroleum Institute Petroleum HPV Testing Group (HPV consortium # , please find attached the Testing Group's response to EPA's letter of April 12, 2004, inquiring on the status of CAS Nos. in our final, outstanding test plan/robust summary submission.

As indicated in the letter, the specified CAS Nos. are being handled under our Heavy Fuel Oils test plan. We anticipate submission of this last of our 13 category test plans by May 31, 2004.

Please do not hesitate to contact me with comments or questions regarding this information.

Sincerely,

Lorraine E. Twerdok, Ph.D., DABT
Manager, Health Sciences
Regulatory Analysis and Scientific Affairs
American Petroleum Institute
1220 L Street, N.W.
Washington, DC 20005

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<<response - late test plan cas # 5-7-04.pdf>>



response - late test plan cas # 5-7-04.pdf

RECEIVED
OPPT/CHIC
04 MAY 10 PM 1:38

May 7, 2004

Administrator
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attention: Chemical Right-to-Know Program

Submitted via email to:
opt.ncic@epa.gov and
chem.rtk@epa.gov

RECEIVED
OPT CBIC
04 MAY 10 PM 1:39

RE: American Petroleum Institute Petroleum HPV Testing Group Consortium

Dear Mr. Auer:

In response to your inquiry, I would like to inform you that the HPV materials referenced in your letter of April 12, 2004, will be covered by our Heavy Fuel Oils test plan that will be submitted to the Agency during May, 2004. This anticipated test plan/robust summary submission date is well before the December 31, 2004 Agency deadline for receipt of outstanding commitments to avoid reclassification of these CAS nos. to orphan status.

As you know, the API Petroleum HPV Testing Group (see attached list of member companies) takes seriously its commitment to the High Production Volume (HPV) Challenge Program. As part of that commitment, the Testing Group has attempted to develop robust summaries and test plans that are scientifically sound, and maximize the use of data, thereby minimizing the need for additional animal testing. To achieve these objectives, we have organized the over 400 materials we are sponsoring into 13 categories, 12 of which have been submitted to the Agency. For each of the categories, we have tried to develop test plans and robust summaries of the highest quality. As a result, when ED issued its 2003 HPV status report "Facing the Challenge", the 4 test plans we had submitted at that time were given an overall rating of 3.8 out of 4.0, with 3 of the four plans receiving "A"s. We have tried to maintain this same level of quality in the eight test plans we have submitted since ED issued its report. However, as the Agency and others have recognized, categories can be difficult to define or justify. Consequently it has taken our group longer than anticipated to submit the test plan and robust summary for our final category, Heavy Fuel Oils. We believe the delay in this submission, while unanticipated, has allowed us to maintain the high quality of this, our final test plan submission.

Finally, it is still our goal to make all data available to the public by 2005.

Please do not hesitate to contact Tom Gray (202-682-8344) or me with any comments or questions you may have regarding this information.

Sincerely,

Lorraine E. Twerdok
API HPV Program Administrator

Cc: Charles Auer (EPA)
Via email Rich Hefter (EPA)
API Petroleum HPV Testing Group Member Companies

Petroleum HPV Testing Group

Members in good standing as of 4/30/04

Amerada Hess Corporation
ATOFina Oil and Chemical Company
Big West Oil LLC/Flying J Inc.
BP p.l.c.
Calcasieu Refining Co.
Cenex Harvest States
ChevronTexaco Products Company
CITGO Asphalt Refining Company
CITGO Petroleum Corporation
ConocoPhillips
Countrymark Cooperative, Inc.
Cross Oil Refining & Marketing, Inc.
Crown Central Petroleum Company
Dakota Gasification Company
Dynegy Midstream Services, Limited Partnership
Edgington Oil Company
Elkhorn Operating Company
Enterprise Products Operating LP
Equilon Enterprises, LLC and Motiva Enterprises, LLC
Ergon Refining, Inc.
Ergon West Virginia
ExxonMobil Co.
Farmland Industries, Inc.
Flint Hills Resources, LP
Formosa Hydrocarbons Co., Inc.
Giant Industries, Inc.
Golden Bear Oil Specialties
Goodyear Tire & Rubber Company
Holly Corporation/Navajo Refining Company
Honeywell International Inc.
Hovensa, LLC
Hunt Refining Company

Petroleum HPV Testing Group

Members in good standing as of 4/30/04

Kern Oil & Refining Co.
La Gloria Oil and Gas
Lion Oil Company
Lyondell-CITGO Refining LP
Marathon Ashland Petroleum LLC
Merichem Chemicals & Refinery Services LLC
Murphy Oil USA, Inc.
National Cooperative Refinery Association
Neville Chemical Company
PDV Midwest Refining, LLC
Pennzoil-Quaker State Co.
Placid Refining Company LLC
Premcor Refining & Marketing, Inc.
Reynolds Metal Company
Safety-Kleen Oil Recovery
Sasol North America, Inc.
Shell Oil Company
Sid Richardson Gasoline Co.
Silver Eagle Refining, Inc.
Sinclair Oil Corporation
South Hampton Refining Co.
Sunoco, Inc.
Tejas Energy, LLC
Tesoro Petroleum Corporation
True Oil Company/Eighty-Eight Oil Company/Equitable Oil Purchasing Company
Unocal Corporation
US Oil & Refining Co.
Valero Energy Corporation
Williams Energy Services
Wynnewood Refining Company